## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re Chapter 11

FTX TRADING, LTD., et al., 1 Case No. 22-11068 (JTD)

(Jointly Administered)

Debtors.

**Objection Deadline:** 

December 17, 2024, at 4:00 p.m. (ET)

**Hearing Date:** 

**TBD** 

NOTICE OF COMBINED FIFTH MONTHLY AND FIFTH INTERIM FEE APPLICATION OF MORRIS, NICHOLS, ARSHT & TUNNELL LLP, AS CO-COUNSEL TO THE AD HOC COMMITTEE OF NON-US CUSTOMERS OF FTX.COM, FOR ALLOWANCE OF MONTHLY COMPENSATION AND FOR REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD AUGUST 1, 2024, THROUGH AND INCLUDING OCTOBER 8, 2024

PLEASE TAKE NOTICE that on the date hereof, Morris, Nichols, Arsht & Tunnell LLP ("Morris Nichols") filed its Combined Fifth Monthly and Fifth Interim Fee Application of Morris, Nichols, Arsht & Tunnell LLP, as Co-Counsel to the Ad Hoc Committee of Non-US Customers of FTX.com, for Allowance of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period of August 1, 2024, Through and Including October 8, 2024 (the "Application") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the Application must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] entered by the Court (the "Interim Compensation Order"), and are required to be filed on or before December 17, 2024, at 4:00 p.m. (ET) (the "Objection Deadline") with the Clerk of the Court, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801, and must be served on the following parties so as to be received by such parties on or before the Objection Deadline:

i. Co-counsel to the Ad Hoc Committee of Non-US Customers of FTX.com, (a) Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market St., 16th Floor, Wilmington, Delaware Attn: Matthew B. Harvey (mharvey@morrisnichols.com) and Jonathan M. Weyand

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. A complete list of the debtors and the last four digits of their federal tax identification numbers may be obtained at <a href="https://cases.ra.kroll.com/FTX">https://cases.ra.kroll.com/FTX</a>.

(jweyand@morrisnichols.com); and (b) Eversheds Sutherland (US) LLP, The Grace Building, 40th Floor, 1114 Avenue of the Americas, New York, New York 10036, Attn: Sarah Paul (SarahPaul@eversheds-sutherland.us) and Erin Broderick (erinbroderick@eversheds-sutherland.com);

- ii. counsel to the above-captioned debtors and debtors in possession, (a) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Alexa J. Kranzley (kranzleya@sullcrom.com) and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Adam G. Landis (landis@lrclaw.com) and Kimberly A. Brown (brown@lrclaw.com);
- iii. counsel to the Official Committee of Unsecured Creditors, (a) Paul Hastings LLP, 200 Park Avenue, New York, New York 10166, Attn: Kris Hansen (krishansen@paulhastings.com), Erez Gilad (erezgilad@paulhastings.com) and Gabriel Sasson (gabesasson@paulhastings.com) and (b) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn: Matthew B. Lunn (mlunn@ycst.com) and Robert F. Poppiti, Jr. (rpoppiti@ycst.com);
- iv. the U.S. Trustee, 844 King Street, Suite 2207, Wilmington, Delaware 19801, Attn: Benjamin A. Hackman (benjamin.a.hackman@usdoj.gov), Linda Richenderfer (linda.richenderfer@usdoj.gov) and Jonathan Lipshie (jon.lipshie@usdoj.gov); and
- v. counsel to Katherine Stadler, the fee examiner appointed in the Debtors' chapter 11 cases, Godfrey & Kahn, S.C., One East Main Street, Suite 500, Madison, Wisconsin 53703 Attn: Mark Hancock (mhancock@gklaw.com).

PLEASE TAKE FURTHER NOTICE THAT IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER, IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER AND THE ABOVE PROCEDURES, THE DEBTORS WILL BE AUTHORIZED TO PAY MORRIS NICHOLS 80% OF THE FEES AND 100% OF THE EXPENSES REQUESTED IN THE MONTHLY FEE STATEMENTS THAT ARE NOT DISPUTED WITHOUT FURTHER ORDER OF THE COURT.

PLEASE TAKE FURTHER NOTICE THAT IF NECESSARY, A HEARING ON THE APPLICATION WILL BE HELD BEFORE THE HONORABLE JOHN T. DORSEY, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801. YOU WILL RECEIVE NOTICE OF THE DATE AND TIME OF THE HEARING WHEN IT IS SCHEDULED.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: November 27, 2024 Wilmington, Delaware

## MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jonathan M. Weyand

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